

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:21-cv-00341-TDS-JEP**

DAVID DUGAN, *on behalf of himself and all others similarly situated,*)
Plaintiff,)
v.)
NATIONSTAR MORTGAGE LLC and ACI)
WORLDWIDE, CORP.,)
Defendants.)

**PLAINTIFF'S UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiff David Dugan (“Plaintiff”), on behalf of himself and all others similarly situated, now moves for an Order certifying the Settlement Class, and entering final approval and judgment on the Settlement.

For the reasons described in the accompanying memorandum of law in support of this motion, the Declaration of Navid Zivari attached hereto as Exhibit A, the Declaration of Thomas A. Zimmerman, Jr. attached hereto as Exhibit B, and the Declaration of Scott C. Harris, which is submitted in support of this motion as well as Plaintiff’s motion for attorneys’ fees and Service Awards. [DE 78-1, ¶¶ 17-69].

Plaintiff requests that this Court grant this motion and enter the proposed Order on Final Approval of Class Action Settlement, attached hereto as Exhibit C.

Respectfully submitted, May 17, 2023.

/s/ Thomas A. Zimmerman, Jr.

Thomas A. Zimmerman, Jr. (pro hac vice)
ZIMMERMAN LAW OFFICES, P.C.
77 W. Washington Street, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 440-0020
Email: tom@attorneyzim.com

Marc E. Dann (pro hac vice)
DANNLAW
15000 Madison Avenue
Lakewood, OH 44107
Telephone: (216) 373-0539
Email: mdann@dannlaw.com
notices@dannlaw.com

Joel R. Rhine, SBN 16028
Martin A. Ramey, SBN 33617
Janet R. Coleman, SBN 12363
Ruth A. Sheehan, SBN 48069
RHINE LAW FIRM, P.C.
1612 Military Cutoff Rd., Suite 300
Wilmington, NC 28403
Telephone: (910) 772-9960
Email: jrr@rhinelawfirm.com
mar@rhinelawfirm.com
jrc@rhinelawfirm.com

Attorneys for Plaintiff and the Settlement Class

CERTIFICATE OF WORD COUNT

I hereby certify pursuant to Local Rule 7.3(d)(1) of the Middle District of North Carolina, that the foregoing Motion complies with the 6,250 word limit according to the word processing system used to process this brief.

Dated: May 17, 2023.

/s/ Thomas A. Zimmerman, Jr.
Thomas A. Zimmerman, Jr. (pro hac vice)
ZIMMERMAN LAW OFFICES, P.C.
77 W. Washington Street, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 440-0020
Email: tom@attorneyzim.com

Attorneys for Plaintiff and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of the filing to all parties of record.

/s/ Thomas A. Zimmerman, Jr.
Thomas A. Zimmerman, Jr. (pro hac vice)
ZIMMERMAN LAW OFFICES, P.C.
77 W. Washington Street, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 440-0020
Email: tom@attorneyzim.com